



Organic Trade Association
Comments to the National Organic Standards Board
November 15, 2000

The Organic Trade Association welcomes new members of the National Organic Standards Board into our common agenda of providing public input into the National Organic Program.

OTA is confident that NOSB members understand the Organic Foods Production Act, the role of the National Organic Standards Board, and the issues surrounding the development of regulations. OTA would like to work closely with the NOSB accomplish the tasks ahead in the next year.

OTA has, since the first meeting of the NOSB in 1992, actively participated with the board in the development of recommendations. OTA members have not only served as members of the NOSB but have been invited to advise NOSB committees and serve as committee or task force members. This is an important partnership – one that must continue. The recommendations of the NOSB impact every member of the Organic Trade Association and the industry upon which their livelihood depends. OTA members and the Association stand ready to assist in this next year with enforcement procedures, the National List petition process, program manuals, and the development of other recommendations for organic production standards. Please remember that there is a body of knowledge and experience within OTA that is available to you.

OTA believes that NOSB has a responsibility to implement and maintain procedures for constituent involvement and transparency and urges you to make these procedures a priority for your term. The public is best served when NOSB chooses to give this responsibility a high priority. OTA appreciates that the members of the NOSB serve as volunteers and that the National Organic Program staff has limited time and resources to allocate for NOSB activities. OTA supports and strongly encourages NOP to hire, as soon as possible, an individual to coordinate the work of the NOSB and assist the Board and NOP in accomplishing their goals.

OTA can also offer some assistance itself, as it has an outreach capability to facilitate broad and diverse participation in the deliberations and recommendations of NOSB and its committees. One solution to the recent communication gaps would be to combine certain resources of the National Organic Program staff, OTA and other organizations. The recent cooperation between NOSB and OTA on a press release about petitioning materials for the National List is one example of what can be done. There are many ways to define the public-private partnership; let us all work together to create the best system for improving the quality of our high-growth niche within a severely challenged agricultural sector.

Regarding materials reviews, OTA recognizes that the technical authority in the field is the Organic Materials Review Institute. OTA certainly supports the recommendations of the National Organic Standards Board but recognizes that both OMRI's review process and the approval of materials by certification agencies has outpaced the NOSB's formation of recommendations, and OTA assures this Board that it will continue working with NOP, AMS, and USDA to secure sufficient resources for NOSB to complete this work in a timely manner.

Again, OTA looks forward to a successful working relationship.

